

**Commonwealth of Kentucky
Energy and Environment Cabinet
Department for Environmental Protection
Division for Air Quality
200 Fair Oaks Lane, 1st Floor
Frankfort, Kentucky 40601
(502) 564-3999**

**AIR QUALITY PERMIT
Issued under 401 KAR 52:040**

Permittee Name: Blue Grass Plating
Mailing Address: 451 North Estill Avenue, Richmond, KY40475

Source Name: Blue Grass Plating
Mailing Address: 1234 S. Brooke St.
Richmond, Ky. 40475

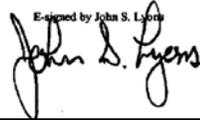
Source Location: Same as above

Permit ID: S-08-126
Agency Interest #: 39059
Activity ID: APE20080001
Review Type: Minor Source, Operating
Source ID: 21-151-00038

Regional Office: Frankfort Regional Office
663 Teton Trail
Frankfort, KY 40601
(502) 564-3358

County: Madison

Application
Complete Date: 10/11/2008
Issuance Date: 11/25/2008
Revision Date:
Expiration Date: 11/25/2018

E-signed by John S. Lyons


**John S. Lyons, Director
Division for Air Quality**

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**Group Requirements****EP 01, Jess up A (Emission Group (1), EP # 1, 2, 3 and 6)**

Construction: 1982

EP 02, Jess up C (Emission Group (2), EP # 8,9,10, and 11)

Construction: 1985

Description:

Zinc Electroplating is a method of coating a metal surface with a metal. It is a soft, ductile, corrosion-resistant finish. Zinc protects the substrate. The zinc corrodes before the base metal, thereby protecting the base metal. For additional corrosion protection, chromates are applied over the zinc. Chromates used in the zinc electroplating process become a component of the coating. Chromate films are normally very thin and the chromate coating provides no measurable thickness to the overall coating. The steps for this process are; Soak, Electro clean, Rinse, Acid Dip, Rinse, Acid Zinc Chloride (Electroplating), Bright Dip, Chromate, Rinse and Soak. The Tanks are of different sizes.

EP 03, Jess up D (Emission Group (3), EP # 12, 13, 14, 15 and 16)

Construction: 1993

Description:

Trivalent Zinc Chromates are also referred to as Hexavalent free chromates. These were developed to accommodate the automotive industries environmental initiatives to reduce the level of hexavalent chromium used in automotive production. The steps for this process are; Soak, Electro clean, Rinse, Acid Dip, Rinse, Alkaline Non-Cyanide zinc (Electroplating), Chromate and Rinse. The Tanks are of different sizes.

EP 04, Zinc Phosphate Coating (Emission Group (4), EP # 17,18,19,20, and 21)

Construction: 1986

Description:

Zinc Phosphate Coating (EP#4) gives base metal surfaces non-conductive, non-metallic properties. Phosphate provides corrosion resistance and is an excellent subsurface for drawing compounds for added corrosion resistance or additional lubricity. Post coatings such as seals and waxes can also be added to phosphate. The steps for this process are; Soak Clean (2), Acid Dip, Phosphate, Rinse and Oil. The Tanks are of different sizes.

EP 05, Black Oxide (Emission Group (5), EP # 22,23,24,25, and 26)

Construction: 1988

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Description:**

Black Oxide (EP#5) is a process in which the coating is applied by submersing the parts into a boiling salt solution. The coating penetrates into the base material; therefore there is no dimensional change. The Tanks are of different sizes.

EP 06, NYR (New York Rack line) (Emission Group (6), EP # 27, 28, 29, 30, 31, 32 and 33)
Construction: 1987

Description:

Zinc Electroplating and Trivalent Chromate (EP#6) is a method of coating a metal surface with a metal. It is a soft, ductile, corrosion-resistant finish. Zinc protects the substrate. The zinc corrodes before the base metal, thereby protecting the base metal. For additional corrosion protection, chromates are applied over the zinc. Chromates used in the zinc electroplating process become a component of the coating. Chromate films are normally very thin and the chromate coating provides no measurable thickness to the overall coating. The steps for this process are; Soak Clean, Rinse, Acid Dip, Rinse, Electro clean, Rinse, Acid Dip, Rinse Electro Plating Bath (Alkaline Non- Cyanide Zinc) Rinse, Bright Dip Chromate and Rinse. The Tanks are of different sizes

EP 07, TN Rack (Tennessee Rack line) (Emission Group (7), EP # 34, 35, 36, 37, 38, 39, 40 and 41)
Construction: 1991

Description:

Trivalent Zinc Chromates (EP#7) are also referred to as Hexavalent free chromates. These were developed to accommodate the automotive industries environmental initiatives to reduce the level of hexavalent chromium used in automotive production. The steps for this process are; Soak Clean, Rinse, Acid Dip, Rinse, Electro clean, rinse Acid Dip, Rinse, bright, Chromate Rinse, Trivalent Black, Rinse and Post Dip. The Tanks are of different sizes.

EP 08, E Coat(Electro Coating line) (Emission Group (8), EP # 42, 43, 44, 45, 46, 47 and 48)
Construction: 1991

Description:

Electro-coating (E-coat)(EP#8) is an immersion painting process in which charged paint particles are attracted to an oppositely charged metallic service. As the paint is deposited, it forms a finish which begins to insulate the metal from the surrounding charged solution. Deposition continues until the coating thickness becomes sufficient to form a barrier against further paint attraction

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Each line does use either centrifugal or forces air drying to finish each of the coating processes. The facility does not employ any control devices for the lines

APPLICABLE REGULATIONS

401 KAR 59:010, *New Process Operations*, applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates, commenced on or after July 2, 1975.

401 KAR 63:020, *Potentially hazardous matter or toxic substances*, is applicable to an emissions unit which emits or may emit potentially hazardous matter or toxic substances, provided such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division for Air Quality.

40 CFR Part 63 Subpart WWWW Area Source Standards for Plating and Polishing, Applicable only to EPs 16, 39, 40 and 46.

1. Operating Limitations:

- a. Pursuant to 401 KAR 63:020, Section 3, no owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants.
- b. For EPs 16, 39, 40 and 46, the permittee must cover the tank surface according to 40 CFR 63.11507(a)(3)(i) or (ii). For batch electrolytic process tanks, as defined in 40 CFR 63.11511, the permittee must use a tank cover, as defined in 40 CFR 63.11511, over all of the effective surface area of the tank for at least 95 percent of the electrolytic process operating time.
- c. Pursuant to 40 CFR 63.11507 (g), the owner or operator of an affected new or existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP, must implement the applicable management practices in paragraphs (g)(1) through (12) of this section, as practicable.

(1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.

(2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.

(3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.

(4) Use tank covers, if already owned and available at the facility, whenever practicable.

(5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).

(6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.

(8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.

(9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic wash downs, as practicable.

(10) Minimize spills and overflow of tanks, as practicable.

(11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.

(12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

Compliance Demonstration Method:

- a. Pursuant to 40 CFR 63.11508(C)(6), the owner or operator of an affected batch electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements of §63.11507(a), “What are my standards and management practices?”, or a flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in §63.11507(b), and comply by operating the affected tank with a cover, must demonstrate continuous compliance according to paragraphs (d)(6)(i) through (iii) of this section:
 - (i) Must operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.
 - (ii) Must record the times that the tank is operated and the times that the tank is covered on a daily basis.
 - (iii) Must state in the annual certification that the tank has been operated with the cover in place at least 95 percent of the electrolytic process time.
- b. Pursuant to 40 CFR 63.11508(C)(3), the owner or operator of an affected batch electrolytic process tank, as defined in §63.11511, “What definitions apply to this subpart?”, that contains one or more of the plating and polishing metal HAP and which is subject to the requirements in §63.11507(a), “What are my standards and management practices?”, and uses a tank cover, as defined in §63.11511, to comply with this subpart, must demonstrate **initial compliance** according to paragraphs (c)(3)(i) through (iv) of this section.
 - (i) Must install a tank cover on the affected tank.
 - (ii) Must state in the Notification of Compliance Status that the tank is operated with the cover in place at least 95 percent of the electrolytic process operating time.
 - (iii) Must implement the applicable management practices specified in §63.11507(g), “What are my standards and management practices?” as practicable.
 - (iv) Must state in the Notification of Compliance Status that he has implemented the applicable management practices specified in §63.11507(g), “What are my standards and management practices?” as practicable.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**2. Emission Limitations:**

- a. Pursuant to 401 KAR 59:010, Section 3(1), visible emissions from the control device or stack for emission points 02 and 03 shall not exceed 20% opacity.
- b. Pursuant to 401 KAR 59:010, Section 3(2), emissions of particulate matter (PM) from the control device or stack to emission point 02 and 03 shall not exceed the allowable limit calculated by the following formula:

$$\text{For process rates up to 60,000 lb/hr: } E = 3.59P^{0.62}$$

Where E = rate of emissions in lb/hr, and
 P = process weight in tons/hr

For processing rates of 1000 lb/hr or less, the emissions of particulate matter shall not exceed 2.34 lb/hr.

3. Testing Requirements:

Pursuant to Regulations 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in Regulation 401 KAR 50:015 shall be conducted at least once per life of this permit as required by the Division

4. Monitoring Requirements:

- a. Opacity Standard: To provide reasonable assurance that the visible emission limitations are being met, the permittee shall:
 - i. Determine the opacity of emissions during operation from each stack or vent by Reference Method 9 quarterly, or more frequently if requested by the Division.
 - ii. Perform a qualitative visual observation of the opacity of emissions from each stack/vent on a weekly basis and maintain a log of the observation. See point 5. Recordkeeping Requirements below.
 - iii. Determine the opacity of emissions by Reference Method 9 if any visible emissions from any stack/vent are observed.
- b. Mass Emission Standard for particulate emissions from all emission points: To provide reasonable assurance that the particulate matter emission limitations are being met, the permittee shall monitor the relevant operating parameters, including but not limited to:
 - i. monthly rate and type of process weight.
 - ii. The monthly total hours of operation.

5. Recordkeeping Requirements:

- a. The permittee shall maintain a log of qualitative visual observations performed. The log shall note:
 - i. Whether any air emissions (except for water vapor) were visible from the vent/stack.
 - ii. All emission points from which visible emissions occurred.
- b. In addition, the permittee shall keep records of the relevant operating parameters, including but not limited to:

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

- i. The monthly rate and type of process weight.
 - ii. The monthly total hours of operation.
- c. For EPs 16, 39, 40 and 46, the permittee must keep the manufacture's specifications and operating instructions at the facility all the times in a location where they can be easily reached.

6. Reporting Requirements:

- a. The permittee shall report any exceedances or excursions from emission limitations or operating limitations. If deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period
- b. The owner or operator of an affected source, must submit a Notification of Compliance Status in accordance with §63.11509(b) of "What are my notification, reporting, and recordkeeping requirements?"
- c. The permittee must be in compliance with the applicable management practices and equipment standards in this subpart at all times.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Group Requirements:

Description:

The natural gas boilers provide heat for process operation.

EP 09 (EP # 49) Boiler

Construction Date: 1995

Fuel Input: 8.4 MM Btu/hr

Primary Fuel: Natural Gas (Only fuel used in this emission unit)

Controls: None

EP 010 (EP # 50) Boiler

Construction Date: 1985

Fuel Input: 3.4 MM Btu/hr

Primary Fuel: Natural Gas (Only fuel used in this emission unit)

Controls: None

EP 011 (EP # 51) Boiler

Construction Date: 1985

Fuel Input: 3.4 MM Btu/hr

Primary Fuel: Natural Gas (Only fuel used in this emission unit)

Controls: None

APPLICABLE REGULATIONS:

401 KAR 59:015, New Indirect Heat Exchangers Applicable with respect to particulate emissions and sulfur dioxide emissions to each affected facility with a capacity of 250 MM Btu/hr or less and commenced on or after April 9, 1972 applies to each of the boilers (1 ,2 and 3) listed above.

1. Operating Limitations:

None

2. Emission Limitations:

a. Emission of particulate matter from each boiler shall not exceed 0.56 lb per mmBtu, [401 KAR 59:015, Section 4(1)(a)]

b. Emission of sulfur dioxide from each boiler shall not exceed 3.0 lb per mmBtu, [401 KAR 59:015, Section 5(1)(a)]

c. The opacity of visible emissions shall not exceed twenty (20) percent. [401 KAR 59:015, Section 4(2)]

Compliance Demonstration Method:

Compliance with emission and opacity limitations is assumed when burning natural gas.

3. Testing Requirements:

Pursuant to 401 KAR 59:005 Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in 401 KAR 50:015 shall be conducted as

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

required by the division

4. Monitoring Requirements:

The permittee shall monitor and maintain records of the following information:

- a. The total monthly fuel usage rate.
- b. The total monthly hours of operation (hours operated per month) of the boiler.

5. Recordkeeping Requirements:

The permittee shall keep records of the relevant operating parameters, including but not limited to:

- i. The monthly rate of fuel usage.
- ii. The monthly total hours of operation.

6. Reporting Requirements:

N/A

SECTION C - GENERAL CONDITIONS

1. Administrative Requirements

- a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
- b. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
- c. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-11 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- d. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition [Section 1a-4, 5, of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- e. This permit does not convey property rights or exclusive privileges [Section 1a-8 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- f. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:040 Section 11(3)].
- h. All previously issued permits to this source at this location are hereby null and void.

SECTION C - GENERAL CONDITIONS (CONTINUED)**2. Recordkeeping Requirements**

- a. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:040 Section 3(1)(f) and Section 1b-IV-2 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

3. Reporting Requirements

- a. (1) In accordance with the provisions of 401 KAR 50:055, Section 1, the permittee shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
 - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.
- (2) The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition a.(1) above), the probable cause of the deviation, and corrective or preventive measures taken; to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report [Section 1b-V-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. The permittee shall furnish information requested by the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the permit [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- c. Summary reports of monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation. The summary reports

SECTION C - GENERAL CONDITIONS (CONTINUED)

are due January 30th and July 30th of each year. All deviations from permit requirements shall be clearly identified in the reports. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

4. Inspections

In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency:

- a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation.
- b. To access and copy any records required by the permit.
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit.
- d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

5. Emergencies/Enforcement Provisions

- a. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing State-Origin Permits* incorporated by reference in 401 KAR 52:040 Section 23].
- b. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
 - (1) An emergency occurred and the permittee can identify the cause of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - (4) The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- c. Emergency provisions listed in General Condition 5.b are in addition to any emergency or upset provision contained in an applicable requirement [401 KAR 52:040, Section 22(1)].
- d. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 52:040, Section 22(2)].

SECTION C - GENERAL CONDITIONS (CONTINUED)

6. Compliance

- a. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:

Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.

- b. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Regional Office listed on the front of this permit in accordance with the following requirements:

- (1) Identification of the term or condition;
- (2) Compliance status of each term or condition of the permit;
- (3) Whether compliance was continuous or intermittent;
- (4) The method used for determining the compliance status for the source, currently and over the reporting period, and
- (5) For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

SECTION C - GENERAL CONDITIONS (CONTINUED)

(6) The certification shall be postmarked by January 30th of each year. Annual compliance certifications shall be mailed to the following addresses:

Division for Air Quality
Frankfort Regional Office
643 Tenton Trail, Suit B
Frankfort, KY 40601

Division for Air Quality
Central Files
200 Fair Oaks Lane, 1st Floor
Frankfort, KY 40601

- c. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
- (1) Applicable requirements that are included and specifically identified in this permit; or
 - (2) Non-applicable requirements expressly identified in this permit [401 KAR 52:040, Section 11].

SECTION D - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to an opacity standard shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspection, evaluation, and any corrective action shall be recorded in a log.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. Oven (1) Electric Curing Oven	401 KAR 59:010
2. Five (5) Centrifugal Dryers	N/A
3. Two (2) Forced Air Dryers	N/A
4. EP 9 Boiler	401 KAR 59:015
5. EP 10 Boiler	401 KAR 59:015
6. EP 11 Boiler	401 KAR 59:015